

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN FEDERATION OF
TEACHERS, AFL-CIO; UNITED
FEDERATION OF TEACHERS; SERVICE
EMPLOYEES INTERNATIONAL UNION,
AFL-CIO; SEIU HEALTHCARE
MINNESOTA & IOWA; SEIU
COMMITTEE OF INTERNS AND
RESIDENTS; UNITED FOOD AND
COMMERCIAL WORKERS
INTERNATIONAL UNION, AFL-CIO;
UFCW LOCAL 135; INTERNATIONAL
ASSOCIATION OF MACHINISTS AND
AEROSPACE WORKERS, AFL-CIO; IAM
DISTRICT 160; AMERICAN
FEDERATION OF STATE, COUNTY &
MUNICIPAL EMPLOYEES, AFL-CIO;
UNITED NURSES ASSOCIATIONS OF
CALIFORNIA/UNION OF HEALTH CARE
PROFESSIONALS; AMERICAN
FEDERATION OF GOVERNMENT
EMPLOYEES, AFL-CIO; and AMERICAN
FEDERATION OF LABOR AND
CONGRESS OF INDUSTRIAL
ORGANIZATIONS,

PLAINTIFFS,

v.

GREGORY GOLDSTEIN, in his official
capacity as Acting Director of the Federal
Mediation and Conciliation Service;
FEDERAL MEDIATION AND
CONCILIATION SERVICE; UNITED
STATES OF AMERICA; UNITED STATES
OFFICE OF MANAGEMENT AND
BUDGET; and RUSSELL T. VOUGHT, in
his official capacity as the Director of the
Office of Management and Budget,

DEFENDANTS.

Case No.: 1:25-cv-03072-AS

**DECLARATION OF
MANEESH SHARMA**

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Pursuant to 28 U.S.C. § 1746, I, Maneesh Sharma, declare as follows:

1. I have personal knowledge of the facts set forth herein, except as to matters stated on information and belief, which I believe to be true. If called as a witness, I could and would testify competently to the facts set forth in this declaration.
2. I am an Associate General Counsel with the American Federation of Labor-Congress of Industrial Organizations (AFL-CIO). The AFL-CIO is a federation of 63 national and international labor organizations, representing 15 million working men and women nationwide and in all industries.
3. I have served as an Associate General Counsel with the AFL-CIO for nearly ten years, cumulatively. Among other responsibilities, I focus on traditional labor law issues, including relating to union organizing and collective bargaining. As part of this job, I am in regular contact with labor lawyers throughout the country that represent AFL-CIO-affiliated unions or those unions' local unions and affiliates.
4. Starting on the morning of March 26, 2025, I began receiving emails from union-side labor lawyers who represent AFL-CIO-affiliated unions (or their locals/affiliates) saying that the FMCS mediator assisting with their collective bargaining had cancelled and informed them that the mediator was placed on administrative leave, and that most of FMCS's operations would cease immediately. Over the next few days, I received a number of similar messages from attorneys representing unions nationwide, as well as had several phone conversations with attorneys who report similar experiences. I know that other attorneys in my office also received similar messages.

5. Some of these attorneys have reported that the absence of the mediator has had negative impacts on the ongoing collective bargaining.

6. Based on these communications, I believe that AFL-CIO affiliates widely have been impacted by the loss of FMCS mediators in their ongoing and soon to begin collective bargaining.

I declare that under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 4/15/25



Maneesh Sharma